	Page 130		Page 132
1	Technologies, but that was with Volt. That was just	1	A. If you had to say if I just considered
2	coincidence that she was there.	2	the City of Albuquerque one client, what others?
3	Q. Other than LKQ and RAC Transport, you don't	3	Less than 15, maybe.
4	remember any other EmployBridge or clients that	4	Q. So it's about 15 clients, plus the City of
5	Amber stopped by?	5	Albuquerque?
<u>6</u>	A. I didn't know who were EmployBridge's	6	A. You could say 15 to 20, maybe. That we
7	clients. I knew who were ProDrivers'. When I heard	7	have, but actually service regularly would be less
8	she had gone to those places, those were places I	8	than ten.
9	knew of.	9	Q. So, the 15 to 20 you service from time to
10	Q. Did you accompany Ms. Fluitt at a visit to	10	time, but you have ten regulars?
11	LKQ or RAC Transport?	11	A. Pretty regulars.
12	A. She went there before I started.	12	Q. Plus the City of Albuquerque?
13	Q. And did you accompany Ms. Fluitt on any	13	A. Yeah. The City of Albuquerque, and less
14	visits to any clients or potential clients?	14	than ten, somewhere in there.
15	A. We drove around a little bit, yeah	15	Q. Is the City of Albuquerque your biggest
16	trained.	16	client?
17	Q. What companies did you visit with	17	A. Yes.
18	Ms. Fluitt?	18	Q. Does RivenRock currently have any plans to
19	A. Went to Array Technologies, which was	19	seek clients outside of Albuquerque?
20	someone I worked with at Volt.	20	A. It is too hard to recruit outside of New
21	Q. What was the name of the company?	21	Mexico with our office.
22	A. Array Technologies. We went shopping	22	Q. Is that a no?
23	just, literally, door knocking, holes in the walls,	23	A. No.
24	and places I never heard of. When you are training	24	Q. What industries does RivenRock service?
25	someone how to cold call, it's someone you don't	25	A. Light industrial, administrative,
	Page 131		Page 133
1	Page 131 do any research. I know nothing about, you know	1	Page 133 transportation.
1 2	_	1 2	_
	do any research. I know nothing about, you know		transportation.
2	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions.	2	transportation. Q. Are those all industries that EmployBridge
2	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn	2	transportation. Q. Are those all industries that EmployBridge serviced, as well?
2 3 4	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell.	2 3 4	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole?
2 3 4 5	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember	2 3 4 5	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah.
2 3 4 5 6 7 8	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array	2 3 4 5 6 7 8	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any
2 3 4 5 6 7 8	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into.	2 3 4 5 6 7 8	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial,
2 3 4 5 6 7 8 9	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into. Q. Any other names you remember?	2 3 4 5 6 7 8 9	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial, administrative and transportation?
2 3 4 5 6 7 8 9 10	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into. Q. Any other names you remember? A. There is a huge list. Pella Windows and	2 3 4 5 6 7 8 9 10	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial, administrative and transportation? A. No. That covers everything.
2 3 4 5 6 7 8 9 10 11	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into. Q. Any other names you remember? A. There is a huge list. Pella Windows and Doors. Just, literally, random places. Anyplace, we	2 3 4 5 6 7 8 9 10 11	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial, administrative and transportation? A. No. That covers everything. Q. What do you mean "that covers everything"?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into. Q. Any other names you remember? A. There is a huge list. Pella Windows and Doors. Just, literally, random places. Anyplace, we would drive and stop and park and walk. Q. What are those names that you can remember? A. I can't think of those names. Just everywhere. Q. If you think of any others, besides the three you mentioned, just let me know, throughout the day? A. Okay. Q. Approximately how many clients does RivenRock currently service?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial, administrative and transportation? A. No. That covers everything. Q. What do you mean "that covers everything"? A. Light industrial is warehouse. Administrative is everything from a receptionist to IT. Industrial is everything from a welder to an electrician to a general laborer, so we can do everything. Q. That covers the panoply? A. It covers the panel, yeah. MS. LIBEU: Is this a good time for a break? MR. STANFORD: Sure.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	do any research. I know nothing about, you know nothing about. Let's just walk in and ask questions. Just introduce yourself, and that's how you learn how to cell. Q. Any other companies that you remember visiting with Ms. Fluitt, other than Array Technologies? A. There is Pepperidge Farms. There is a lot of companies that we tried to walk into. Q. Any other names you remember? A. There is a huge list. Pella Windows and Doors. Just, literally, random places. Anyplace, we would drive and stop and park and walk. Q. What are those names that you can remember? A. I can't think of those names. Just everywhere. Q. If you think of any others, besides the three you mentioned, just let me know, throughout the day? A. Okay. Q. Approximately how many clients does RivenRock currently service?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	transportation. Q. Are those all industries that EmployBridge serviced, as well? A. EmployBridge, as a whole? Q. Yes. A. Yes. That's what I've heard. They do everything, so yeah. Q. Does RivenRock have any plans to target any other industries other than light industrial, administrative and transportation? A. No. That covers everything. Q. What do you mean "that covers everything"? A. Light industrial is warehouse. Administrative is everything from a receptionist to IT. Industrial is everything from a welder to an electrician to a general laborer, so we can do everything. Q. That covers the panoply? A. It covers the panel, yeah. MS. LIBEU: Is this a good time for a break? MR. STANFORD: Sure.

	Page 150		Page 152
1	MR. STANFORD: Same objection. Foundation.	1	MR. STANFORD: Objection. Form.
2	Form.	2	A. I never talked to Mike Pacheco when I left
3	A. He wouldn't say anything. We haven't been	3	ProDrivers.
4	there since we left.	4	Q. Do you know a company called Acme Iron and
5	Q. Why would Fran send an e-mail to Mike	5	Metal?
6	DeLusque saying that you had visited Mike Pacheco, if	6	A. I do.
7	you hadn't?	7	O. Is that a was that a ProDrivers'
8	MR. STANFORD: Same objection. Form and	8	customer when you were at ProDrivers?
9	foundation.	9	A. It was.
10	A. Again, Fran will stop at nothing to	10	Q. And was that a customer that you serviced
11	sabotage someone. She sabotaged her own client,	11	while at ProDrivers?
12	calling DOT on her clients and her drivers. What	12	A. Yes.
13	would stop her from that's my opinion. What would	13	Q. And how long had Acme Iron and Metal been a
14	stop her from doing that to me. If she has done it	14	client of ProDrivers at the time you had been there?
15	before, so this doesn't surprise me at all. Of	15	A. Only the last six to eight months that I
16	course, she would lie.	16	was with ProDrivers.
17	Q. So, there is absolutely no truth to her	17	Q. How about Stock Building Supply, how long
18	e-mail that you visited Mike Pacheco?	18	had they been a client of ProDrivers, while you were
19	A. No truth, since I left ProDrivers, did I	19	there?
20	meet Mike Pacheco at any location of Stock Building	20	A. They were a client before I got there.
21	Supply.	21	Q. Do you know how long they had been a client
22	Q. It looks like from Fran's e-mail, that it	22	before you arrived at ProDrivers?
23	says that you were RivenRock was starting a	23	A. I don't know the number.
24	driving service as early as July 1st, 2016. That's	24	Q. Have you had any contact with anyone at
25	what her e-mail suggests, right?	25	let me ask this: Who was your contact at Acme Iron
	what her e-mail suggests, right:		tee the disk this. Who was your conduct at retine from
	Page 151		Page 153
1	A. That's what the e-mail says.	1	and Metal when you were at ProDrivers?
2	Q. Were you starting a driving service as	2	A. I can't remember the names. It's been too
3	early as July 1st 2016?	3	long.
4	A. No.	4	Q. Was one of your contacts a gentleman named
5	Q. How much after this e-mail did the driving	5	Keaton Wynn?
6	service at RivenRock begin?	6	A. That sounds familiar. What was the name?
7	A. Begin, more than 30 days.	7	Q. Keaton Wynn.
8	Q. And you started preparing in mid July?	8	A. It could be, yeah. Again, it's been
9	A. Mid July, 20th, going forward mid to	9	awhile.
10	late July.	10	Q. But the name sounds familiar?
11	Q. Did you ever tell Mr. Pacheco that if Stock	11	A. Sounds familiar.
12	used RivenRock for its driving means, it could save	12	Q. Have you ever had any contact with Keaton
13	\$5 per hour over EmployBridge's rate?	13	Wynn since leaving ProDrivers?
14	MR. STANFORD: Objection. Form.	14	A. If that was one of my contacts there, no.
15	Go ahead.	15	Q. Have you had any contact with anyone at
16	A. I never talked to Mike Pacheco, since I	16	Acme Iron and Metal, since you joined RivenRock?
17	left ProDrivers.	17	A. I have not made any contact with anybody
18	Q. So you never said that to him?	18	from Acme Iron and Metal since leaving ProDrivers.
19	MR. STANFORD: Objection. Form. Counsel,	19	(Exhibit 8 marked.)
20	you're asking the same questions three and four	20	Q. (By Ms. Libeu) Do you have Exhibit 8 in
21	times. Let's move on.	21	front of you?
22	A. I never talked to Mike Pacheco when I left	22	A. I do.
23	ProDrivers.	23	Q. I'll represent to you, again, this is
		24	·
24	O. So you never told him that he could save \$5		another document produced by EmbloyBridge. And it
24 25	Q. So you never told him that he could save \$5 an hour over EmployBridge rates?	25	another document produced by EmployBridge. And it has got Bates number in the lower right-hand corner,

	Page 154	Page 156
1	EB88. Do you see that?	it says, I was told by them that "they" had left
2	A. Yes.	2 ProDrivers. "They" doesn't make sense. Amber was
3	Q. And do you see that it's an e-mail from	never part of ProDrivers. So that automatically
4	Keaton Wynn to Fran Scott, on July 14, 2016?	4 tells me that he doesn't know what he is talking
5	A. I do see that.	5 about.
6	Q. And do you see that the e-mail address from	6 Q. So the "they" in that e-mail means he is
7	Mr. Wynn is Keaton@acmeironandmetal.com?	7 telling lies all throughout the e-mail?
8	A. Yes.	8 MR. STANFORD: Objection. Form and
9	Q. Does that refresh your memory that Keaton	9 foundation.
10	Wynn was at Acme Iron and Metal?	A. Again, I don't know. I'm not him. I don't
11	A. It does now.	know why he would lie. But that there tells me it
12	Q. Do you see that the subject line of the	doesn't make sense.
13	e-mail is "Timothy and Amber"?	Q. Did you ever visit Acme Iron and Metal with
14	A. Yes.	Amber Fluitt?
15	Q. And Mr. Wynn writes to Fran Scott, Dear	A. I have never visited Acme Iron and Metal,
16	Fran, two weeks ago, on July 1st, I was approached	since I left ProDrivers.
17	by Timothy Jacquez and an ex-coworker of ours named	Q. So Mr. Wynn's statement that you and Amber
18	Amber. I was told by them they had left ProDrivers	Fluitt went and met him at Acme Iron and Metal is
19	and started their own company. I was told by them	19 incorrect?
20	that the company was similar to ProDrivers, they	MR. STANFORD: Counsel, I'm going to one
21	would hire truck drivers to go work temporary jobs	more form. We need to stop this pattern of saying
22	for other companies. They informed me that if I got	the same questions three and four times.
23	rid of ProDrivers, with their new company they would	MS. LIBEU: I'm going through each line of
24	give me better rates than I was currently getting.	the e-mail. I'm allowed to ask that.
25	They also stated that they would employee other job	MR. STANFORD: You have asked the question
	Page 155	Page 157
1	_	Page 157 three and four times.
1 2	skilled employees besides truck drivers, torch	
	skilled employees besides truck drivers, torch cutters, crane operators and mechanics, to be	three and four times. MS. LIBEU: I'm entitled to an answer.
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	Page 186		Page 188
1	A. Yes.	1	A. I'm starving.
2	Q. But it wasn't this Eric, to the best of	2	MS. LIBEU: Let's take a lunch break.
3	your memory?	3	(Recess was taken from 12:47 to 1:46 p.m.)
4	A. I can't remember who that was.	4	Q. (By Ms. Libeu) I'm going to give you
5	Q. What were those conversations about?	5	another document.
6	A. Following up on business, why we don't have	6	(Exhibit 11 marked.)
7	business with them anymore.	7	Q. (By Ms. Libeu) Do you have Exhibit 11 in
8	Q. Why don't you have business with them	8	front of you?
9	anymore?	9	A. I do.
10	A. Workers' comp is way too high. It is a	10	Q. Have you seen this document before?
11	dangerous environment.	11	A. No, not that I can recall.
12	Q. Why did they call you, and not Amber?	12	Q. Can I have you look at the top of the page,
13	A. They called the main office phone.	13	where it says "From"?
14	Q. And you answered?	14	A. Okay.
15	A. (Witness nods head.)	15	Q. Does it appear to be an e-mail you sent to
16	Q. You have to answer audibly?	16	Fran Scott on June 2nd of 2016?
17	A. Yes.	17	A. It look like it.
18	Q. How long of a time period did RivenRock	18	Q. But you don't remember this e-mail?
19	service Sagebrush Sales?	19	A. No.
20	A. I do not know.	20	MR. STANFORD: Is that the 8th or 2nd?
21	Q. Do you know what time I realize you	21	MS. LIBEU: 8th. Did I say 2nd?
22	don't know what time it began. Do you know what time	23	MR. STANFORD: You did.
23	it ended?	24	Q. (By Ms. Libeu) I'm sorry. It appears to
24 25	A. I do not know, actually.	25	be an e-mail from you to Fran Scott on June 8, 2016, correct?
23	Q. Do you know how many people, or how many		concer
	Page 187		Page 189
1	field associates RivenRock placed at Sagebrush Sales?	1	A. Uh-huh.
2	A. I do not know.	2	Q. You have to answer audibly.
3	Q. And Rio Grande Drywall, is that a company	3	A. Yes.
4	you reached out to while you were at ProDrivers?	4	Q. Any reason to doubt that you sent this
5	A. Yes.	5	e-mail?
6	Q. Did they become a ProDrivers' client?	6	A. No.
7	A. No.	7	Q. Do you see that you write, "Fran, I have
8	Q. Have you talked to anyone at Rio Grande	8	either had an appointment to meet with the
9	Drywall since joining RivenRock?	9	decision-maker, and did, or I did a drop-in and met
10	A. I have not.	10	with the decision-maker." And then there is a list
11	Q. And Bruckner Leasing, is that another	11	of companies. Do you see that?
12	company you reached out to while at ProDrivers?	12	A. Uh-huh. Yes. Sorry.
13 14	A. Yes.	13 14	Q. Is this list of companies in Exhibit 11,
15	Q. And did they become a ProDrivers' client? A. No.	15	companies that you contacted while at ProDrivers?
16		16	A. Yes. Q. Can you look through the list and tell me
17	Q. Have you talked to anyone at Bruckner Leasing since joining RivenRock?	17	whether any of these whether you have contacted
18	A. No.	18	any of these clients while at RivenRock?
19	Q. And other than Champion and Sagebrush	19	A. The only one I've had contact with is RAC
20	Sales, which we've discussed, are you aware of	20	Transport.
21	anyone not just you personally, talking to anyone	21	Q. And tell me about that contact?
22	at any of the companies listed on Exhibit 10?	22	A. So he called in, wanted to speak to Amber.
23	A. No.	23	I remember actually remember when I talked to him.
24	Q. Do we want to take a lunch break? Is the	24	He wanted to have a conversation with Amber. She
25	witness getting hungry.	25	wasn't in. They were looking for, like, a mechanic,

	Page 190		Page 192
1	anyone in the area, general realm. So we talked	1	A. For the companies he was a former
2	about it. We never filled anything with it, as a	2	employee of YRC Transport.
3	mechanic.	3	Q. Of YRC?
4	Q. And when you say he called in, who is the	4	A. Yes.
5	"he" you are referring to?	5	Q. Is that an EmployBridge company?
6	A. I cannot remember his name. The operations	6	A. That is a ProDrivers' company they worked
7	guy. It has been so long, I can't think of his name.	7	with.
8	Q. But someone at RAC Transport?	8	Q. I want to make sure I'm understanding. He
9	A. Yes.	9	worked for YRC Transport, but not through ProDrivers?
10	Q. And called asking for Amber?	10	A. He worked for that company, and
11	A. Yes.	11	ProDrivers we serviced that account. He worked
12	Q. Had Amber made contact with him previously?	12	specifically for that company.
13	A. She had.	13	Q. Was he considered an associate of
14	Q. Tell me what you know about that?	14	ProDrivers or EmployBridge at that time?
15	A. Just again, knocked on doors. That was a	15	A. No, he's never been an employee field
16	client she had just walked into. They have a big	16	employee, or anything of ProDrivers.
17	warehouse.	17	Q. He was just directly employed by YRC?
18	Q. How did she learn about RAC Transport? Did	18	A. Yes.
19	someone give her that name, or did she just see it on	19	Q. Other than the one run that Mr. Smith did
20	the side of the road?	20	for YRC Transport, has RivenRock provided any other
21	A. Just driving. She is territory management,	21	services to RAC Transport?
22	again, and ran into one of them.	22	A. Not since then. We haven't done anything
23	Q. And you said RivenRock didn't end up	23	with them.
24	filling that mechanic position?	24	Q. Before then were there any services that
25	A. No.	25	RivenRock provided to RYC Transport?
	Page 191		Page 193
1	Q. Has RivenRock provided any services to RAC	1	Page 193 A. No. They called for a couple of admin
1 <mark>2</mark>		1 2	
	Q. Has RivenRock provided any services to RAC	I _	A. No. They called for a couple of admin
2	Q. Has RivenRock provided any services to RAC Transport?	2	A. No. They called for a couple of admin positions, but we never filled them.
3	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them	3	A. No. They called for a couple of admin positions, but we never filled them.Q. Other than RAC Transport, are there any
2 3 4	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time.	3 4	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have
2 3 4 5	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that?	2 3 4 5	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock?
2 3 4 5	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime.	2 3 4 5 6	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no.
2 3 4 5 6 7	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who	2 3 4 5 6 7	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that
2 3 4 5 6 7 8	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run?	2 3 4 5 6 7 8	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes.
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2 3 4 5 6 7 8 9	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of	2 3 4 5 6 7 8 9	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of RivenRock's? A. Yes. Q. How did he become a field associate at RivenRock? A. Called in looking for work. Q. He called your office?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap. Q. That is on the first page, HD Supply White Cap? A. Yes. Q. What others?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of RivenRock's? A. Yes. Q. How did he become a field associate at RivenRock? A. Called in looking for work. Q. He called your office? A. Yes. Q. Who spoke to him? A. All of us. He did his orientation, paperwork, everything.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap. Q. That is on the first page, HD Supply White Cap? A. Yes. Q. What others? A. It looks like that is the only one. Q. And what has RivenRock's relationship been with HD Supply White Cap? A. We purchased safety equipment from them
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of RivenRock's? A. Yes. Q. How did he become a field associate at RivenRock? A. Called in looking for work. Q. He called your office? A. Yes. Q. Who spoke to him? A. All of us. He did his orientation, paperwork, everything. Q. Do you know whether Jason Smith has ever	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap. Q. That is on the first page, HD Supply White Cap? A. Yes. Q. What others? A. It looks like that is the only one. Q. And what has RivenRock's relationship been with HD Supply White Cap? A. We purchased safety equipment from them before, for some of our field associates hard
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of RivenRock's? A. Yes. Q. How did he become a field associate at RivenRock? A. Called in looking for work. Q. He called your office? A. Yes. Q. Who spoke to him? A. All of us. He did his orientation, paperwork, everything. Q. Do you know whether Jason Smith has ever been a field associate for ProDrivers?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap. Q. That is on the first page, HD Supply White Cap? A. Yes. Q. What others? A. It looks like that is the only one. Q. And what has RivenRock's relationship been with HD Supply White Cap? A. We purchased safety equipment from them before, for some of our field associates hard hats, safety gloves.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Has RivenRock provided any services to RAC Transport? A. I think we had someone do a run for them one time. Q. When was that? A. I can't recall the date, August sometime. Q. And do you remember who the person was who did the run? A. Jason Smith. Q. And is he the field associate of RivenRock's? A. Yes. Q. How did he become a field associate at RivenRock? A. Called in looking for work. Q. He called your office? A. Yes. Q. Who spoke to him? A. All of us. He did his orientation, paperwork, everything. Q. Do you know whether Jason Smith has ever been a field associate for ProDrivers? A. Never has. Q. How about for any of the EmployBridge	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. They called for a couple of admin positions, but we never filled them. Q. Other than RAC Transport, are there any other companies on Exhibit 11 that you have communicated with while at RivenRock? A. Me, no. Q. Are there any companies on Exhibit 11 that someone, other than you, has communicated with on behalf of RivenRock? A. Other than me, yes. Q. And which companies is that? A. HD Supply White Cap. Q. That is on the first page, HD Supply White Cap? A. Yes. Q. What others? A. It looks like that is the only one. Q. And what has RivenRock's relationship been with HD Supply White Cap? A. We purchased safety equipment from them before, for some of our field associates hard hats, safety gloves. Q. So RivenRock has purchased things from HD Supply White Cap?
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A. No. We have one of those shred things like just a shredder. Q. Vou have that at your house? A. I do it with all of my paperwork, like when syou pet credit card strill. We been a victim of credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred credit card fraud, like, four times, so I shred cocuments you had at your house after you left proDrivers? A. Shortly after I left, within days. Q. And when did you do that shredding? A. Shortly after I left, within days. Q. Was there any hard copy documents from proDrivers you had that you didn's shred? A. Not to my knowledge. I shredded coverything. Q. What about stuff that you emailed you were af ProDrivers' A. All of the time? Q. And what tyes of things did you e-mail yourself? A. Dispatch sheets that had driver's names, mambers, contacts, client lists, client's numbers, production of the proDriver's material d. A limely Jacquezedy whon, Q. Did you celete all of the ProDrivers' information that you had forward any of the ProDrivers' around a day to the shared fine? A. Not to my knowledge. ProDrivers' Q. Dad what tyes of things did you e-mail yourself? A. All of the time? Q. And what tyes of things did you e-mail yourself? A. Dispatch sheets that had driver's names, mambers, contacts, client lists, client's numbers, production of the problems of the prob		Page 254		Page 256
2 like just a shredder Q. Vou have that at your house? 2 A. I don't even save text messages. Every day one of the properties of the properties of the properties of credit card fraud, like, four times, so I shared everything. 1 Centary of the properties of credit card fraud, like, four times, so I shared everything. 2 Centary of the properties of credit card fraud, like, four times, so I shared everything. 3 Centary of the properties of credit card fraud, like, four times, so I shared everything. 3 Centary of the properties of the properti	1	A. No. We have one of those shred things	1	O. And
Q. You have that at your house? A. I do it with all of my paperwork, like when you get credit card stuff. Ive been a victim of credit card fraud, like, four times, so I shred everything. Q. And so you shredded the ProDrivers' declete fext messages, phone calls. I delete my lists, my e-mail - I delete all that. Q. When did you delete all of the ProDrivers' information that you had forwarded to yourself? A. A day or two after I left. Q. And so you shredded the ProDrivers' A. A day or two after I left. Q. And when did you do that shredding? A. Everything I had with that. Q. Was there any hard copy documents from ProDrivers you had that you didn't shred? A. Not to my knowledge. I shredded everything. Q. What about stuff that you e-mailed you were at ProDrivers? A. All of the time. Q. What about stuff that you e-mailed you were at ProDrivers? A. All of the time. Q. And what rypes of things did you e-mail yourself? A. Dispatch sheets that had driver's names, mumbers, contacts, client isits, client's names, mumbers, contacts, client shortling. Q. And what remail address did you use to send if its younself? A. They personal e-mail, because, like I said, I can't go to my - sometimes I can't get to my work e-mail, my work e-mail. Q. What is your personal e-mail? Q. What is your personal e-mail? A. Timothy Jacquez@Yahoo. Page 255 A. No. Q. What is your personal e-mail? A. Timothy Jacquez@Yahoo. A. Timothy Jac	2	_	2	`
A. Ido it with all of my paperwork, like when by ought credit card fraud, like, four times, so I shared credit card fraud, like, four times, so I shared coverything. Q. And so you shredded the ProDrivers' documents you had at your house after you left proDrivers' a documents you had at your house after you left proDrivers' a documents you had at your house after you left proDrivers' a documents you had at your house after you left proDrivers' a documents you had at your house after you left proDrivers' a documents you had at your house after you left proDrivers' a documents you had not you had forwarded to yourself? A. And yo row after 1 left, within days. Q. And when did you do that shredding? A. Shortly after I left, within days. Q. And when did you do that shredding? A. Shortly after I left, within days. Q. Was there any hard copy documents from proDrivers you had that you didn't shred? A. No to my knowledge. I shredded everything. Q. What about stuff that you e-mailed yourself? Was that something you did routinely white you were after you were your your your your your your your your	3	=	3	
syou get credit card stuff. I've been a victim of credit card frand, like, four times, so I shred ceverything. Q. And so you shredded the ProDrivers' documents you had at your house after you left documents you had at your house after you left A. Everything I had with that. Q. And when did you do that shredding? A. Shortly after I left, within days. Q. Was there any hard copy documents from ProDrivers you had that you didn't shred? A. Not to my knowledge. I shredded Q. What about stuff that you e-mailed yoursel? Was that something you did routinely while you were at ProDrivers' A. All of the time. Q. And what it types of things did you e-mail yoursel? A. Dispatch sheets that had driver's names. mumbers, contacts, client lists, client's numbers. Page 255 Page 257 A. Mo, just me. Q. Und what de-mail address did you us to send it to yourself, while you presonal e-mail? Q. What your presonal e-mail? A. Is morthly Jacquezie/Yahoo. Q. Did you ever forward ProDrivers' material forwarding it to yourself, while you worke there? A. No, just me. Q. Did you forward ProDrivers' documents to you had and sent to yourself, after you left there, did you anyone observed the proprieter's documents to you had and sent to yourself, after you left three, did you anyone observed the proprieter's documents that you had sent to yourself, after you left ProDrivers? A. No, just me. Q. Und what did you do with the e-mails you had sent to yourself, after you left there, did you anyone observed the proprieter's documents that you had sent to your protice of printing materials in June of 2016, as a similar forward any of the ProDrivers' documents that you had in your possession to anyone else? A. No, just me. Q. I had what did you do with the e-mails you had sent to yourself, after you left three, did you anything that doesn't have porta	4		4	
credit card fraud, like, four times, so I shred reverything. Q. And so you shredded the ProDrivers' documents you had at your house after you left ProDrivers' A. Everything I had with that. Q. And when did you do that shredding? A. Everything I had with that. Q. And when did you do that shredding? A. Everything I had with that. Q. Was there any hard copy documents from ProDrivers you had that you doint's shred? A. Not on my knowledge. I shredded A. Not on my knowledge. I shredded A. Not on my knowledge. I shredded What about stuff that you e-mailed yourself? Was that something you did routinely while you were at ProDrivers' A. All of the time. Q. And what rypes of things did you e-mail A. Dispatch sheets that had driver's names, numbers, contacts, client lists, client's numbers, page 255 Page 255 A. My personal e-mail, because, like I said, I Q. What is your personal e-mail. My personal e-mail, because, like I said, I Q. What is your personal e-mail. My personal e-mail, because, like I said, I Q. What is your personal e-mail. My personal e-mail, because, like I said, I Q. What is your personal e-mail for your personal e-mail for your personal e-mail. My personal e-mail, because, like I said, I Q. Did you cere forward ProDrivers' material Q. Did you forward ProDrivers' material Q. Did you felter the deleted items folder, as well? Page 257 A. No. So, Indeed have copies of it. Again, I dorr have access to internet, so if it so yourself; did you always use that yaland and that stuff, on my personal e-mail you when the way personal e-mail you when the way planning on still giving frow weeks, if they came back and countered – give my when the way planning on still giving frow weeks, if they came back and countered – give my when the semant you left than, cither – when you were the problems of	5	* * *	5	
everything. Q. And so you shredded the ProDrivers' documents you had at your house after you left ProDrivers? A. Everything I had with that. 22 Q. And when did you do that shredding? A. Shortly after I left, within days. 33 A. Shortly after I left, within days. 44 Q. Was there any hard copy documents from 45 ProDrivers you had that you didn't shred? 45 A. Not to my knowledge. I shredded 46 A. Not to my knowledge. I shredded 47 everything. 48 Q. And she state smelting you did routinely while you were aft ProDrivers? 49 Q. What about stuff that you e-mailed 40 yourself? Was that something you did routinely while you were aft ProDrivers? 40 A. All of the time. 41 Q. Dad you start e-mailing yourself more things in June of 2016, or was it fairly typical of yourself? 42 Q. And what types of things did you e-mail 43 yourself? 44 A. Dispatch sheets that had driver's names, and provided the time. 45 mumbers, contacts, client lists, client's numbers. 46 Page 255 47 Contacts, rates. I had all that stuff. 48 Q. And what e-mail address did you use to send it to yourself? 49 Q. Mad what e-mail address did you use to send it to yourself? 40 Q. Mad what e-mail address did you use to send it to yourself. 41 A. Before I left? 41 A. Before I left? 42 Q. And before deleting it, did you forward it to anyone else? 42 Q. Did you start e-mailing yourself more things in June of 2016, or was it fairly typical of yourself? 41 A. It is fairly typical with e-mailing, but all for more printing out. Like I said, I go to Northem New Mexico, so I print out mostly everything so I lemand out to make ense. So when I was planning variations — I'm planning all of this was planning out to make ense. So when I was planning variations. I'm planning all of this was planning on still giving fell thing, I'm still going to continue to do my job. So on your provinced was planning on still giving in finding a power cord. 40 Q. What is your personal e-mail? 41 Yahon account? 42 Q. Did you forward ProDrivers' documents to anything on what feel you left Pro	6		6	-
8 A. A day or two after I left. 9 Did you delete the deleted items folder, as well as the probrivers? 11 A. Everything I had with that. 12 Q. And when did you do that shredding? 13 A. Shortly after I left, within days. 14 Q. Was there any hard copy documents from ProDrivers you had that you didn't shred? 15 ProDrivers you had that you didn't shred? 16 A. Not on my knowledge. I shredded 17 everything. 18 yourself? Was that something you did routinely while you were at ProDrivers? 19 A. If of the time. 10 Q. And what types of things did you e-mail yourself? 10 Q. And what types of things did you e-mail yourself? 11 contacts, rates. I had all that stuff. 12 Q. And what types of things did you use to send if to yourself? 13 Q. And what e-mail address did you use to send if to yourself? 14 Contacts, rates. I had all that stuff. 15 Q. And what e-mail address did you use to send if to yourself? 16 Contacts, rates. I had all that stuff. 17 Q. Mat is your personal e-mail? 18 Q. And what e-mail address did you use to send if to yourself? 19 Q. What is you personal e-mail? 20 Q. Did you delete the deletted items folder, as well as the first probriver in the first probries in the first probries in the first probries in the probriver in the first probries in the first probries in the probriver in the first probries of the first probries in the probriver in the first probries in the probriver in the probriver in the first probries of the probriver in the first probries in the probriver in the probriver in the first probries in the probries of the probrivers in the first probries in the probriver in the first probries in the probriver in the first probries in the probriver in the first probries in the probries in the probriver in the first probries in the probriver in the probries in the pr	7		7	•
documents you had at your house after you left ProDrivers? A. Everything I had with that. C. And when did you do that shredding? A. Shortly after I left, within days. Q. Was there any hard copy documents from ProDrivers you had that you didn't shred? A. Not to my knowledge. I shredded ProDrivers you had that you didn't shred? A. Not to my knowledge. I shredded ProDrivers you had that you didn't shred? A. Not to my knowledge. I shredded A. No to my knowledge. I shredded A. No to my knowledge. I shredded A. No. Q. And before deleting it, did you forward it to anyyone else? A. All of the time. Q. And what something you did routinely while you were at ProDrivers? A. All of the time. Q. And what pres of things did you e-mail youself? A. Dispatch sheets that had driver's names, mumbers, contacts, client lists, client's numbers. Page 255 Page 255 Page 257 Page 257 A. My personal e-mail, because, like I said, I or any thing other than, either – when you were forward proDrivers' material to to anything other than, either – when you were forwarding it to yourself? A. Timothy Jacquez/@Yahoo. Q. Did you start e-mailing yourself more things in June of 2016, or was it fairly typical of your practice prior to thar? Yourself? A. My personal e-mail, because, like I said, I or anything other than, either – when you were forward proDrivers' material to to anything other than, either – when you were forward proDrivers' material You were forward proDrivers' documents to or you prosession to anyone else? A. No. So you printed out more materials in June of 2016 (no main) to anything other than, either – when you were forward proDrivers' documents to or you prosession to anyone else? A. No. O. Did you detect the deleted items folder. A. Peah. A. Before I left? A. Before I left? A. Before I left? A. Before I left? A. A. Before I left? A. No. Q. And before deleting it, did you print out any or fired. To anyone else? A. No. A. No. C. D. After you left on printing down and it to anyone else? A.	8		8	•
10 well? 11 A. Everything I had with that. 12 Q. And when did you do that shredding? 13 A. Shortly after I left, within days. 14 Q. Was there any hard copy documents from 15 ProDrivers you had that you didn't shred? 16 A. Not to my knowledge. I shredded 17 everything. 18 Q. What about stuff that you e-mailed 19 yourself? Was that something you did routinely while 20 you were at ProDrivers? 21 A. All of the time. 22 Q. And what types of things did you e-mail 23 yourself? 24 A. Dispatch sheets that had driver's names, 25 numbers, contacts, client lists, client's numbers. 26 numbers, contacts, client lists, client's numbers. 27 Page 255 1 contacts, rates. I had all that stuff? 28 Q. And what e-mail address did you use to send 19 Q. And what e-mail address did you use to send 11 to yourself? 12 Q. And what e-mail address did you use to send 12 (Q. Mad what e-mail address did you use to send 13 it to yourself? 14 A. Before I left? 15 A. No. 16 Q. And before deleting it, did you forward it to anyone clse? 16 A. No. 27 Q. And before deleting it, did you forward it to anyone clse? 18 A. No. 29 (D. Did you start e-mailing yourself more things in June of 2016, or was it fairly typical of your practice prior to that? 29 your practice prior to that? 20 (D. Did you start e-mailing your self more things in June of 2016, or was it fairly typical of your practice prior to that? 29 Year of the start your practice prior to that? 20 (D. Did you start e-mail address did you use to send it to yourself?) 20 (D. And what e-mail address did you use to send it to yourself?) 21 (Q. And what e-mail address did you use to send it to yourself?) 22 (Q. And what e-mail address did you use to send it to yourself?) 23 (D. A. My personal e-mail?) 24 (A. My personal e-mail?) 25 (D. What is your practice and your practice of it wouldn't make precess to internet, so if if I send it to myself, it wouldn't make precess to when I was planning vacations — I'm planning all of these things coming up in late June, July. So I nead to anything other than,	9		9	•
Q. And when did you do that shredding? A. Shortly after I left, within days. Of it? A. Shortly after I left, within days. A. Shortly after I left, within days. A. Shortly after I left, within days. The proDrivers you had that you didn't shred? A. Not to my knowledge. I shredded A. No to my knowledge. I shredded A. No to my knowledge. I shredded C. A. No. Q. After you left? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. And before deleting it, did you forward it to anyone else? A. No. Q. Did you start e-mailing yourself more things in June of 2016, or was it fairly typical of your practice prior to that? A. It is fairly typical with e-mailing, but a flairly typical of your practice prior to that? A. It is fairly typical with e-mailing, but a flairly typical of your practice prior to that? A. Hor part year any typical with e-mailing your practice prior to that? A. My personal e-mail, because, like I said, I go to Northern New Mexico, so I print out mostly everything so I what the printing out. Like I said, I go to Northern New Mexico, so I print out mostly everything so I it to yourself? A. My personal e-mail, because, like I said, I go to my some delegation of the set things coming up in late June, July. So I need to the set things coming up in late June, July. So I need to the set things coming up in late June, July. So I need to the set things coming up in late June, July. So I need to the well and you were law your province prior to do my job. A. Timofhy Jacquezig/ Ya	10	ProDrivers?	10	· · · · · ·
A. Shortly after I left, within days. 14 Q. Was there any hard copy documents from 15 ProDrivers you had that you didn't shred? 16 A. Not to my knowledge. I shredded 17 cverything. 18 Q. What about stuff that you e-mailed 19 yourself? Was that something you did routinely while 19 yourself? Was that something you did routinely while 19 yourself? Was that something you did routinely while 20 you were at ProDrivers? 21 A. All of the time. 22 Q. And what types of things did you e-mail 23 yourself? 24 A. Dispatch sheets that had driver's names, 25 numbers, contacts, client lists, client's numbers. 26 numbers, contacts, client lists, client's numbers. 27 Page 255 28 A. Dispatch sheets that had driver's names, 29 numbers, contacts, client lists, client's numbers. 29 (Q. And what e-mail address did you use to send 30 it to yourself? 40 Q. And what e-mail address did you use to send 41 it to yourself? 41 contacts, rates. I had all that stuff. 42 Q. And what e-mail address did you use to send 43 it to yourself? 44 A. Before I left? 45 A. No. 46 Q. Did you start e-mailing yourself more 46 (when I was planning out. Like I said, I go to Northern 47 New Mexico, so I print out mostly everything so I 48 Q. Dad what e-mail address did you use to send 49 it to yourself? 40 A. My personal e-mail, because, like I said, I 41 Could have copies of it. 42 Q. And what e-mail address did you use to send 43 it to yourself? 41 A. No. 42 Q. And before deleting it, did you forward it to anyone clse? 42 A. No. 43 No. 44 No. 44 No. 45 No. 46 Unity in the deserve dealth in the e-mail of your practice prior to that? 46 A. No. 47 A. No. 48 A. Dispatch sheets that had driver's names. 48 A. Dispatch sheets that had driver's names. 48 A. Dispatch sheets that had driver's names. 49 (all thought in the deserve thing of your practice prior to that? 40 A. It is fairly typical of your prior to that? 41 A. No. 42 No. 43 (to troversiting out. Like I said, I go to Northern 44 No. 45 (to two weeks. 46 (to two repression of the your self. 46 (to have - even	11	A. Everything I had with that.	11	A. Yeah.
Q. Was there any hard copy documents from ProDrivers you had that you idn't shred? A. Not to my knowledge. I shredded everything. Q. After you left? A. No. Q. And before deleting it, did you forward it to anyone clse? Q. And about stuff that you e-mailed yourself? Was that something you did routinely white you were at ProDrivers? A. All of the time. Q. And what types of things did you e-mail Q. Did you start e-mailing yourself more (things in June of 2016, or was it fairly typical of your practice prior to that?) A. Dispatch sheets that had driver's names, numbers, contacts, client lists, client's numbers. Page 255 Page 257 contacts, rates. I had all that stuff. Q. And what e-mail address did you use to send it to yourself? A. My personal e-mail, because, like I said, I can't go to my sometimes I can't get to my work e-mail, my work e-mail. Q. What is your personal e-mail? A. Timothy Jacquez@Yahoo. Q. Did you vere forward ProDrivers' material forwarding it to yourself, did you always use that Yahoo account? G. Did you start e-mailing yourself more (things in June of 2016, or was it fairly typical of your practice prior to that?) A. Timothy Jacquez@Yahoo. G. Did you forward ProDrivers' material to anyone other than yourself, did you always use that Yahoo account? G. O. What is your personal e-mail? A. Yes. G. Did you forward ProDrivers' documents to anyone other than yourself, while you worked there? A. No, [I was because, the I said, I or have access to intermet, so if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wouldn't make sense. So if I send it to myself, it wou	12	Q. And when did you do that shredding?	12	Q. Before deleting it, did you print out any
15 ProDrivers you had that you didn't shred? 16 A. Not to my knowledge. I shredded 16 A. Not to my knowledge. I shredded 17 everything. 18 Q. What about stuff that you e-mailed 19 yourself? Was that something you did routinely while 20 you were at ProDrivers' 21 A. All of the time. 22 Q. And what types of things did you e-mail 23 Q. Mal what types of things did you e-mail 24 A. Dispatch sheets that had driver's names, 25 numbers, contacts, client lists, client's numbers. 26 numbers, contacts, client lists, client's numbers. 27 Page 255 28 contacts, rates. I had all that stuff. 29 Q. And what e-mail address did you use to send 30 it to yourself? 40 Q. And what e-mail address did you use to send 31 it to yourself? 41 Contacts, rates. I had all that stuff. 42 Q. And what e-mail address did you use to send 33 it to yourself? 44 Q. And what e-mail address did you use to send 35 it to yourself? 46 Q. Mad what e-mail address did you use to send 36 it to yourself? 47 Q. And what e-mail address did you use to send 38 it to yourself? 48 Q. Mat is your personal e-mail? 49 Q. What is your personal e-mail? 50 Q. Did you cere forward ProDrivers' material 51 Growarding it to yourself, did you always use that 52 Q. Did you overeforward ProDrivers' material 53 quy one other than yourself, while you worked there? 54 A. No, 10 g. So you printed out more materials in June 55 quy one other than yourself, while you worked there? 56 A. No, 10 g. Did you forward ProDrivers' documents to anyone other than yourself, while you worked there? 58 quy one other than yourself, while you worked there? 59 q. A. No. 50 Q. Did you forward ProDrivers' documents that you had forward any of the ProDrivers' documents that you had for your prosession to anyone else? 50 Q. How about after you left there, did you had sent to yourself, after you left ProDrivers? 50 Q. And what did you do with the e-mails you had sent to yourself, after you left ProDrivers? 51 A. Thore really bad OCD, so I cleaned out - anything of the doctor that of the proDrivers' docum	13		13	of it?
A. Not to my knowledge. I shredded reverything. Q. What about stuff that you e-mailed yourself? Was that something you did routinely while you were at ProDrivers? A. All of the time. Q. And what types of things did you e-mail yourself? A. No. Q. Did you start e-mailing yourself more things in June of 2016, or was it fairly typical of your practice prior to that? A. It is fairly typical with e-mailing, but a lot more printing out. Like I said, I go to Northern New Mexico, so I print out mostly everything so I Page 255 Page 257 1 contacts, rates. I had all that stuff. Q. And what e-mail address did you use to send it to yourself? A. My personal e-mail, because, like I said, I can't go to my sometimes I can't get to my work e-mail, my work e-mail. Q. What is your personal e-mail? A. Timothy Jacquez@Yahoo, Q. Did you sere froward ProDrivers' material to have e-ven though I was planning on still giving forwarding it to yourself; did you always use that Q. Did you ever forward ProDrivers' material forwarding it to yourself, did you always use that Q. Did you forward ProDrivers' documents to anyone else? A. No. A. No. Could have copies of it. Again, I don't have access to internet, so when I was planning vacations – I'm planning all of these things coming up in late June, July. So I need to have e-ven though I was planning on still giving two weeks, if they came back and countered – give me more money, whatever the case was, or everything fell through, I'm still going to continue to do my job. So, I needed to have – I was prepared to work weekends, even on my vacation. I did it on mini vacation, anyway. So it was common practice, getting ready for things I needed. A. No. C. So you printed out more materials in June of 2016 than was typical of your proir estam period? A. No. C. So you printed out more materials in June of 2016 than was typical of your proir estam period? A. No. C. So you printed out more materials in June of 2016, was similar there is fairly typical of your proir estam period? A.	14	Q. Was there any hard copy documents from	14	A. Before I left?
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18 Q. What about stuff that you e-mailed 29 yourself? Was that something you did routinely while 29 you were at ProDrivers? 21 A. All of the time. 22 Q. And what types of things did you e-mail 23 yourself? 24 A. Dispatch sheets that had driver's names, 25 numbers, contacts, client lists, client's numbers, 26 A. Dispatch sheets that had driver's names, 27 numbers, contacts, client lists, client's numbers, 28 numbers, contacts, client lists, client's numbers, 29 vourself? 20 Q. And what e-mail address did you use to send 30 it to yourself? 4 A. My personal e-mail, because, like I said, I can't go to my - sometimes I can't get to my work 4 e-mail, my work e-mail, 5 can't go to my - sometimes I can't get to my work 6 e-mail, my work e-mail, 7 Q. What is your personal e-mail? 8 A. Timothy Jacquez@'yahoo. 9 Q. Did you ever forward ProDrivers' material 10 to anything other than, either - when you were 110 forwarding it to yourself, did you always use that 111 Yahoo account? 112 Yahoo account? 113 A. Yes. 115 Can't go to my - sometimes I can't get to my work 116 forwarding it to yourself, while you worked there? 117 A. Timothy Jacquez@'yahoo. 118 Q. Did you forward ProDrivers' documents to 119 Q. How about after you left there, did you 110 forward any of the ProDrivers' documents that you had 110 forward any of the ProDrivers' documents that you had 111 in your possession to anyone else? 112 Q. And what did you do with the e-mails you 113 had sent to yourself, after you left ProDrivers'? 114 A. No. You can look real quick yeah, it's there. 115 Q. And what did you do with the e-mails you 116 had sent to yourself, after you left ProDrivers'? 117 Q. And what did you do with the e-mails you 118 had sent to yourself, after you left ProDrivers'? 119 Q. And what did you do with the e-mails you 119 had sent to yourself, after you left ProDrivers'? 110 A. No. You can look real quick yeah, it's there. 1110 Q. So you printed out more materials in June of 2016, was similar to your protice for printing materials while you wer	16	A. Not to my knowledge. I shredded	16	A. No.
yourself? Was that something you did routinely while you were at ProDrivers? A. All of the time. Q. And what types of things did you e-mail yourself? A. Dispatch sheets that had driver's names, numbers, contacts, client lists, client's numbers. Page 255 Page 257 contacts, rates. I had all that stuff. Q. And what e-mail address did you use to send it to yourself? A. My personal e-mail, because, like I said, I can't go to my- sometimes I can't get to my work e-mail, my work e-mail. Q. What is your personal e-mail? A. Timothy_Jacquez@Yahoo. Q. Did you ever forward ProDrivers' material to tanything other than, either - when you were forwarding it to yourself, did you always use that Q. Did you forward ProDrivers' documents to anyone other than yourself, while you worked there? A. No, just me. Q. And what did you do with the e-mails you had sent to yourself, after you left ProDrivers? A. I have really bad OCD, so I cleaned out anything that doesn't have to pertain to anything on 12. You ran look really in a first light yopical of your practice prior to that? 22. You can look real spating yourself more things in June of 2016, we was it fairly typical of your practice prior to that? 23. A. It is fairly typical with e-mailing, but a lot more printing out. Like I said, I go to Northern New Mexico, so I print out mostly everything so I 23. A. It is fairly typical with e-mailing, but a lot more printing out. Like I said, I go to Northern New Mexico, so I print out mostly everything so I 24. A. My personal e-mail, because, like I said, I 25. Could have copies of it. A. It is fairly typical with e-mailing, but a 26. A. It is fairly typical of to that? 27. Could have copies of it. 28. A. It is fairly typical with e-mailing, but a 29. If send it to myself, it wouldn't make sense. So 40. What is your personal e-mail. 40. Shaping a land address did you address did you use to send 41. If send it to myself, it wouldn't make sense. So 42. What is your personal e-mail, because, like I said, I 43. A. It is fa	17	everything.	17	
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A. All of the time. Q. And what types of things did you e-mail) yourself? A. Dispatch sheets that had driver's names, numbers, contacts, client lists, client's numbers, Page 255 Page 257 contacts, rates. I had all that stuff. Q. And what e-mail address did you use to send it to yourself? A. My personal e-mail, because, like I said, I can't go to my sometimes I can't get to my work e-mail, my work e-mail. Q. What is your personal e-mail? A. Timothy Jacquez@Yahoo. Q. Did you ever forward ProDrivers' material to to anything other than, either when you were forwarding it to yourself, did you always use that Yahoo account? A. No, just me. Q. An dwhat did you do with the e-mails you had sent to yourself, after you left ProDrivers? A. No. A. When I was planning vacations I'm planning all of the have even though I was planning on still giving two weeks, if they came back and countered give me more money, whatever the case was, or everything fell through, I'm still going to continue to do my job. So, I needed to have I was prepared to More weekends, even on my vacation. I did it on min vacation, anyway. So it was common practice, getting ready for things I needed. Q. So you printed out more materials in June of 2016 than was typical of your prior team period? A. No, it's the same. Every week I would print out and take home dispatch. Fran and I would do it. If she is playing in her garden, or doing whatever, we can look at a sheet. It's easier than opening a laptop, starting it, finding a power cord. You can look real quick yeah, it's there. Q. So it would be fair to say your practice for printing materials while you were	19		19	
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Page 258 Page 260 1 1 A. Yeah, we did it all of the time. And felt like I was going to print stuff out. Like I 2 sending things to your personal e-mail was real said, I wasn't seeing someone during that time 3 3 common, too. When I started at ProDrivers, before I period, so I'm going to print stuff out and go by 4 even had a ProDrivers' e-mail, Fran was sending me myself to Northern New Mexico to family. So I would 5 dispatch sheets to my personal e-mail so I could be in the loop, before I started. I remember calling Q. Did you send more things to yourself in 7 her saying, I don't even know what this is. She just June of 26th than other time periods? said, I'm trying to keep you in the loop. I was, A. Probably. 9 9 like, this means nothing to me right now. It was Q. And that was because why again? 10 10 common to send things any which way. A. Dating someone, and I'm not going out of 11 town, so I could be local and look at a phone or my Q. What about volume of printing? Was it 11 12 approximately the same volume of materials you e-mail or my laptop. 13 printed in June of 2016, than in earlier periods at 13 O. Prior to June 2016? 14 14 ProDrivers? A. Yeah. 15 15 Q. When did you start dating your current A. It is about the same. As -- when I started 16 16 we didn't have very many drivers. When I left we had girlfriend? 17 17 more, so it was probably more pages. As we went on, A. Not current anymore. I'm single. 18 18 we would have more pages. Q. My assumption was incorrect. 19 Q. So you didn't print more materials in June 19 MR. STANFORD: You're zero for two. 20 20 than you did in earlier periods? Getting this guy in trouble. 21 21 A. It is pretty much the same. A. I'm very lonely. Thank you. 22 22 Q. What about e-mailing things to yourself? Q. I'm so sorry. When did you start dating 23 23 Did you do more e-mailing in June of 2016 of your girlfriend that you were dating in June of 2016? 24 materials to yourself, than you did in earlier time 24 25 25 periods at ProDrivers? Q. So you started dating her in May? Page 259 Page 261 1 1 A. Sometimes, yes. If I wasn't going out of A. Yes.

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- A. Sometimes, yes. If I wasn't going out of town -- I was dating someone at the time, so I usually never did go up to Northern New Mexico. I stayed down here most of the time, so I could e-mail stuff instead of printing it out.
 - Q. But in terms of how many e-mails you sent to yourself, was it more frequent? Did you do it more often in June of 2016, than earlier periods, or was it approximately the same?
 - A. Kind of the same.

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- Q. So it was something you did routinely throughout your employment at ProDrivers?
- A. Printing out, e-mailing stuff, it just depended on how busy we were, but like I said, I was dating someone, so you try not to go out of town and do it real quick. I don't want a laptop at dinner. I could have something handy and look at it real quick, make a phone call.
- Q. So if someone were to go back in time and look and, you know, pre-June 2016 how much you e-mailed things to yourself, and June 2016, June 2016 shouldn't be materially different than the other time periods?
- A. No. Like I said, there was probably more kind of went through. I don't know, just however I

- Q. Beginning of May? End of May?
 - A. Middle, towards the end.
 - Q. Did you e-mail yourself things in May, so
 - that you could visit her, as well?
 - A. Yes. I would print stuff out, e-mail, whatever is convenient that day.
 - Q. So you -- did you go visit her, and I apologize not being familiar with New Mexico
- apologize not being familiar with New Mexico geography. You went north to visit her? A. No, she lived here. If I was going to go,
- north, before I started dating her, I would print something out. She is here local in Albuquerque, so I could -- I'm here, I'm -- I have internet access. If I have my laptop, or if my phone worked, I would send it to myself.
 - Q. Okay. So did you send -- you went to Northern New Mexico more before you started dating your then girlfriend in May of 2016, right?
 - A. Correct.
 - Q. So was -- is it correct, before you started dating her, you printed out more things than after you started dating her?
 - A. Correct.
 - Q. And would that be the same with e-mail as

	Page 262		Page 264
1	well, you e-mailed more things before you started	1	A. Pretty shortly, within a few months.
2	dating her, than after?	2	Q. Of April of 2015?
3	A. I e-mailed more things when I was dating	3	A. Yeah, probably.
4	her.	4	Q. And then it was something that you did as
5	Q. And that's because you had internet access	5	needed, probably weekly?
6	here?	6	A. Weekly. Printed more stuff than anything,
7	A. Yes, because I'm not going out of town	7	yeah.
8	much.	8	Q. How many times a month, let's say, in 2015,
9	Q. And you e-mailed yourself things in May	9	on average, would you send yourself things from your
10	because you were dating her, and you were staying	10	ProDrivers account to your Yahoo account?
11	local?	11	A. In 2015?
12	A. Yes.	12	Q. Yes.
13	Q. And you e-mail them from the ProDrivers'	13	A. Couple times a month, each.
14	account?	14	Q. And then what about in early 2016, let's
15	A. ProDrivers, yeah, because it is easier to	15	say before May when you started dating your then
16	go to my thing and send it.	16	girlfriend January, February, March, April, how
17	Q. And you continued e-mailing things to	17 18	many times a month would you e-mail yourself from
18	yourself in June of 2016 from your ProDrivers'		your ProDrivers' account to your Yahoo account?
19 20	account, right? A. Yes.	19 20	A. In February I sent me some stuff that I had. January, I think I did. Probably March and
21		21	April. I know we had a really big account that I was
22	Q. Did you e-mail yourself more things in June of 2016, or May of 2016?	22	working around the clock weekends, nights. I was
23	A. I don't know. I e-mailed things as I	23	getting calls nonstop about it. So I had paper
24	needed them, printed out things as I needed them.	24	forms. I had e-mail forms. I looked at both. I
25	Q. Was it when did you start at ProDrivers	25	literally had paper forms sitting on the desk right
	Q. Was it when did you suit at 1105111015		movem, mad pupor rooms oroming on one cook right
	Page 263		Page 265
1	Page 263 again?	1	Page 265 next to my bed, when they would call me at 2:00 in
1 2	again? A. April 2015.	1 2	next to my bed, when they would call me at 2:00 in the morning and I would have to dispatch, and say,
	again? A. April 2015. Q. So did you e-mail your stuff e-mail your	2	next to my bed, when they would call me at 2:00 in the morning and I would have to dispatch, and say, Call this person, and it's easier to look at real
2 3 4	again? A. April 2015. Q. So did you e-mail your stuff e-mail your stuff from your ProDrivers' account in April 2015?	2 3 4	next to my bed, when they would call me at 2:00 in the morning and I would have to dispatch, and say, Call this person, and it's easier to look at real quick.
2 3 4 5	again? A. April 2015. Q. So did you e-mail your stuff e-mail your stuff from your ProDrivers' account in April 2015? A. When I was learning, some e-mail, some	2 3 4 5	next to my bed, when they would call me at 2:00 in the morning and I would have to dispatch, and say, Call this person, and it's easier to look at real quick. Q. So in January, February, March, April, you
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	Page 274		Page 276
1	dispatch on June 16, 2016?	1	cards, postcards. All of this stuff goes into
2	A. It looks very possible, yes.	2	ProTread. I needed all of this information to go
3	Q. Do you have any reason to believe you	3	it is funny how corporate actually, they have no
4	didn't e-mail yourself that dispatch?	4	idea what we are doing in each office. When you ask
5	A. No.	5	them, when we went to corporate meetings, they would
6	Q. And that was, again, the day after	6	ask you what you guys do. What am I in charge of?
7	Mr. Miller texted you and said this was going to	7	From start to finish, and they didn't really know.
8	happen, right?	8	Q. If this is a template, I'm wondering why
9	A. Right.	9	would you need a template?
10	Q. And if you look down to the next document	10	A. So I could have all of my documentation, so
11	there, it says 6/16, and it looks like the e-mail	11	when I do my own forensic investigation, I have
12	subject you e-mailed yourself, "driver card template	12	everything I possibly need.
13	with logo." Do you see that?	13	Q. And why would a template help you with
14	A. Yes.	14	that, is what I'm wondering?
15	Q. Do you have any reason to believe you	15	A. It's just the paperwork. It is what it's
16	e-mailed yourself any reason to believe you did	16	called. It's just a form.
17	not e-mail yourself that on June 16, 2016?	17	Q. So you were going to use a driver card
18	A. No.	18	template to do your own forensic investigation on
19	Q. Why would you e-mail yourself a driver card	19	what commissions you were owed?
20	template?	20	A. Everything I would possibly need to get
21 22	A. Like I said, I was told from Fran, told	21	someone hired, from start to finish, I want all that
23	from Mike, the reason I'm very unhappy and Fran	23	paperwork I have.
24	and I had these conversations after Terry left. We	24	Q. Why?
25	were both unhappy. She is unhappy with commission. I'm unhappy. Can't figure out numbers. I have to	25	A. So I can go to the corporate office and say, This it what I'm going to be getting paid on.
	Thi unitappy. Can't rigure out numbers. Thave to		say, This it what Thi going to be getting paid on.
	Page 275		Page 277
1	Page 275 get myself in line for what I'm going to do.	1	Page 277 This is all the paperwork I'm signing. You can go
1 2	get myself in line for what I'm going to do. My ultimate plan was to get everything I	1 2	This is all the paperwork I'm signing. You can go check all of our documents, and there you go.
2	get myself in line for what I'm going to do. My ultimate plan was to get everything I possibly needed to show, I'm supposed to be getting	2	This is all the paperwork I'm signing. You can go check all of our documents, and there you go. Q. I understand why the filled out forms might
2 3 4	get myself in line for what I'm going to do. My ultimate plan was to get everything I possibly needed to show, I'm supposed to be getting commission off someone that I hire and bring in the	2 3 4	This is all the paperwork I'm signing. You can go check all of our documents, and there you go. Q. I understand why the filled out forms might help you with that. Why would a template help you
2 3 4 5	get myself in line for what I'm going to do. My ultimate plan was to get everything I possibly needed to show, I'm supposed to be getting commission off someone that I hire and bring in the office. So who am I going to show this to? I can't	2 3 4 5	This is all the paperwork I'm signing. You can go check all of our documents, and there you go. Q. I understand why the filled out forms might help you with that. Why would a template help you with that?
2 3 4 5 6	get myself in line for what I'm going to do. My ultimate plan was to get everything I possibly needed to show, I'm supposed to be getting commission off someone that I hire and bring in the office. So who am I going to show this to? I can't go to Fran. She doesn't know how to pull numbers.	2 3 4 5	This is all the paperwork I'm signing. You can go check all of our documents, and there you go. Q. I understand why the filled out forms might help you with that. Why would a template help you with that? MR. STANFORD: Objection. Form. Asked and
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	get myself in line for what I'm going to do. My ultimate plan was to get everything I possibly needed to show, I'm supposed to be getting commission off someone that I hire and bring in the office. So who am I going to show this to? I can't go to Fran. She doesn't know how to pull numbers. Mike is telling me he can't do anything. Do some research yourself. The only other resource I have would be in the Atlanta, Georgia, office. So if I can bring everything I need to someone for what I do, and how I'm supposed to get paid. And these are the documents I need to get someone from start to finish, I have to have all of my ducks in a row. Apparently, I can't do it in the Albuquerque office. I can't do all this by myself, so I have to do what I need to do. I need to have dispatch sheets so I can reconcile everything that I could possible need. Plus I'm still dispatching and doing my job, so I need to have my dispatch and client lists so I can get in touch with everything. Q. Why would you need a driver card template? A. This is all of the information that you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	This is all the paperwork I'm signing. You can go check all of our documents, and there you go. Q. I understand why the filled out forms might help you with that. Why would a template help you with that? MR. STANFORD: Objection. Form. Asked and answered. Answer it again. A. It's what it's called. It's just what it's called. Q. Do you see something on there that says "2013 ProTread log-in instructions"? A. Yes. Q. What's that? A. ProTread is what drivers are using. Any driver that goes on the road has to do a ProTread module. I have to go in and check it, make sure they actually did it. Again, it is part of the hiring criteria before they turn a wheel. Q. Is ProTread ProDrivers specific? A. No. Anyone can log in. Q. Anyone in the industry?

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1	use ProTread but they're supposed to.	1	I'm not going to go back into a hostile work
2	Q. And so why did you e-mail yourself all of	2	environment, when I'm getting text messages from Mike
3	these materials in June of 2016?	3	DeLusque saying, We'll go after you to the full
4	A. Because that's at the time	4	extent. We don't care about money. So, of course,
5	MR. STANFORD: Objection. Form.	5	I'm not going to go back into that hostile work
6	Go ahead for the fourth time.	6	environment.
7	A. Again, I'm getting to the point now where	7	Q. When was the first time that you contacted
8	I'm super frustrated in not getting paid correctly.	8	EmployBridge or ProDrivers' corporate?
9	No one is helping me. I need to have everything I	9	A. Beginning of June.
10	could possibly need so I can go to my corporate	10	
11	office. I'm getting no support from Fran Scott, Mike	11	Q. Before you left?
12		12	A. Yes.
13	DeLusque, any of my other senior managers were	13	Q. Who did you speak to?
14	actually not they actually took a demotion to a		A. I can't remember. That's what I'm saying.
15	different role no longer a market leader. They	14	I can't remember the name. Whoever answered the
	are sales managers now.	15	phone. They said, We'll put you on hold. What
16	I have to have everything I could possibly	16	office are you calling from? What state? New
17	need so I can take it to the Atlanta, Georgia,	17	Mexico. Hold on. There is only one office in New
18	office, or contact them. People I don't know I	18	Mexico.
19	want to make sure I have everything I could possibly	19	Q. What number did you call from?
20	need, so when I go to them, they can go, okay. This	20	A. It's like I would have to. I don't
21	is what I do. This is what I have. This is what I'm	21	know. I had it on my directory.
22	supposed to get paid on. To get drivers through the	22	Q. Did it have, like did it say
23	process, this is all of the paperwork I have. This	23	EmployBridge corporate, did it tell you a specific
24	is what I'm doing. This is my job, and I need all of	24	department?
25	my documentation behind me.	25	A. It is ProDrivers' corporate office.
	Page 279		Page 281
1		1	
1 2	Q. Did you contact EmployBridge or ProDrivers'	1 2	Q. So it said ProDrivers' corporate office, or
	Q. Did you contact EmployBridge or ProDrivers' corporate office?		Q. So it said ProDrivers' corporate office, or something similar?
2	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did.	2	Q. So it said ProDrivers' corporate office, or something similar?A. Yes.
2	Q. Did you contact EmployBridge or ProDrivers' corporate office?A. I did.Q. When?	2	Q. So it said ProDrivers' corporate office, or something similar?
2 3 4	 Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time 	2 3 4	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes.
2 3 4 5	 Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. 	2 3 4 5	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time
2 3 4 5	 Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? 	2 3 4 5 6	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left?
2 3 4 5	 Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some 	2 3 4 5 6 7	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July.
2 3 4 5 6 7 8	 Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office 	2 3 4 5 6 7 8	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what?
2 3 4 5 6 7 8	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I	2 3 4 5 6 7 8	 Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime.
2 3 4 5 6 7 8 9	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the	2 3 4 5 6 7 8 9	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then?
2 3 4 5 6 7 8 9 10	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to	2 3 4 5 6 7 8 9 10	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta
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2 3 4 5 6 7 8 9 10 11 12	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They	2 3 4 5 6 7 8 9 10 11 12	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number.
2 3 4 5 6 7 8 9 10 11 12 13	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened.	2 3 4 5 6 7 8 9 10 11 12 13	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock.	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire paperwork that I supposedly signed.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have? They said, Well, we don't know. Every
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire paperwork that I supposedly signed. When I called the corporate office, they	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have? They said, Well, we don't know. Every office is a little different. I said, Is there any
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire paperwork that I supposedly signed. When I called the corporate office, they would put me on hold numerous times when I called.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have? They said, Well, we don't know. Every office is a little different. I said, Is there any paperwork, such as non-compete, anything that I have?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire paperwork that I supposedly signed. When I called the corporate office, they would put me on hold numerous times when I called. And they said, well, you need to go into the local	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have? They said, Well, we don't know. Every office is a little different. I said, Is there any paperwork, such as non-compete, anything that I have? They said, Hold on. What office are you from?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Did you contact EmployBridge or ProDrivers' corporate office? A. I did. Q. When? A. Shortly after I left, and during the time when I was there. Q. Tell me about the time when you were there? A. Called them. Tried to get some clarification. I had only been to the Atlanta office one time. I didn't really know who to ask for, if I could get some clarification. I don't remember the person's name who it was who I can talk to about certain commissions, and EBITDAs and all of this stuff. I don't understand the logistics. They said they would get back to me, never happened. I ended up getting a job with RivenRock. Left. Tried contacting them again to get some clarification, if I did have any kind of non-competes or any kind of paperwork. I wanted my whole new hire paperwork that I supposedly signed. When I called the corporate office, they would put me on hold numerous times when I called.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. So it said ProDrivers' corporate office, or something similar? A. Yes. Q. And was that in Atlanta? A. Yes. Q. And then you called them a second time after you left? A. After I left, yes, in July. Q. About July what? A. Beginning of July sometime. Q. And what number did you call then? A. The same number. I just Googled Atlanta ProDrivers' office. Q. And you called the same number. A. Yes. Q. And you said the second time you wanted to call and you asked if you had a non-compete? A. I said any new hire paperwork that I have. What kind of paperwork do I have? They said, Well, we don't know. Every office is a little different. I said, Is there any paperwork, such as non-compete, anything that I have?

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1	wanted to touch freight, don't touch freight. It is	things out. We shared it with clients all of the
2	something basic so if you have a client, you can look	time. They would say, Who's here? I would say, Let
3	and see what they can and can't do.	me look at my dispatch. No, he worked this place
4	Q. Does it have a schedule on where they	yesterday, so actually he can't run because he
5	worked? When they're scheduled to work, that kind of	doesn't have enough hours. They would say, Who else
6	thing?	6 did that? Oh, they worked with this company
7	A. For the week, yeah.	yesterday. So clients knew who we worked with, and
8	Q. It has a weekly schedule?	8 we printed things out. It was not confidential at
9	A. That's how you dispatch. So if I have it	9 all.
10	printed out in front of me, an after-hours saying who	Q. But did you share it with the dispatch
11	are your available drivers, they have the same list	list itself with clients?
12	I'm looking at. I can tell them, this is is Ryder	A. With clients, no. They didn't get a
13	certified. Send this person. Don't send this	physical copy itself.
14	person. This person worked on Tuesday, but they also	Q. When you printed out the dispatch list to
15	worked all week, and they don't have their ten hours	work at home, did you share it with anyone outside of
16	down, so I can track everything.	ProDrivers?
17 18	Q. And how was the dispatch list created?	A. No, nobody would be interested in my job. O When you say it's not you're saying it
19	A. Myself and Fran. Fran kind of did it	Q. When you say it's not you're saying it is not confidential, because you were allowed to
20	had a generic one, and we modified it as it made more sense to us.	print it?
21	Q. So there was an existing one when you	21 A. Yes.
22	started with the company?	Q. But were you allowed to share it with
23	A. Yes.	people outside of ProDrivers?
24	Q. And then you and Fran modified it over	A. I wouldn't share it with anyone outside of
25	time?	ProDrivers, anyway. If they wanted to look at it,
	Page 291	Page 293
1	A. Yes. What makes it easier for you. At a	Fran or Mike never said no, just your eyes only. It
2	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever
2	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at.	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok.
2 3 4	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a
2 3 4 5	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers?	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said,
2 3 4 5	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data?	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just,
2 3 4 5	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism
2 3 4 5 6 7	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time?	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing.
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2 3 4 5 6 7 8	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time?	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of
2 3 4 5 6 7 8 9	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time? A. Yeah. Q. And who had access to the dispatch list at	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of ProDrivers?
2 3 4 5 6 7 8 9 10	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time? A. Yeah. Q. And who had access to the dispatch list at ProDrivers? A. Everyone. Q. What do you mean "everyone"?	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of ProDrivers? A. No.
2 3 4 5 6 7 8 9 10 11	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time? A. Yeah. Q. And who had access to the dispatch list at ProDrivers? A. Everyone.	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of ProDrivers? A. No. Q. Why not?
2 3 4 5 6 7 8 9 10 11 12 13	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time? A. Yeah. Q. And who had access to the dispatch list at ProDrivers? A. Everyone. Q. What do you mean "everyone"? A. Myself, Fran, Mike DeLusque, Tom Snable, after hours, Tennessee, everyone.	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of ProDrivers? A. No. Q. Why not? A. Why would I share that with a competitor of ProDrivers? If it is not confidential, why wouldn't you
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. What makes it easier for you. At a glance, so you can look at it, makes it easier to just look at. Q. Was it a collection was it data collected over time at ProDrivers? A. Data? Q. Like the information data, was it collected over time? A. Yeah. Q. And who had access to the dispatch list at ProDrivers? A. Everyone. Q. What do you mean "everyone"? A. Myself, Fran, Mike DeLusque, Tom Snable, after hours, Tennessee, everyone. Q. Did anyone outside of the company have	Fran or Mike never said no, just your eyes only. It was okay. There was nothing like that that was ever expressed. There was nothing in any handbok. Nothing like that when I hired, because I never got a handbook, so there was nothing like that that said, these are the rules and regulations. It is just, again, I didn't get proper training. I got baptism by fire. No handbook, no nothing. Q. Did you ever share it with a competitor of ProDrivers? A. No. Q. Why not? A. Why would I share that with a competitor of ProDrivers? Q. If it is not confidential, why wouldn't you share?
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1	working at RivenRock?	1	Fran took I followed Fran's footsteps on some
2	A. Yeah, I guess so.	2	thing, minus the forgery and fraud, I wouldn't do.
3	Q. Did you give this dispatch a copy of	3	But as far as sending me dispatch sheets, printing
4	this dispatch to anyone at RivenRock?	4	dispatch sheets, anything like that, yeah, we both
5	A. No.	5	did it.
6	Q. What did you do with this e-mail after you	6	Q. Do you know if there was a policy that you
7	left ProDrivers?	7	were prohibited from taking dispatch lists after your
8	A. Everything was deleted.	8	employment with ProDrivers ended?
9	Q. Do you recall approximately when you	9	A. If there was one, it would have been in the
10	deleted this e-mail?	10	handbook, which I never got, so, no, I never knew
11	A. I don't.	11	that.
12	Q. Would it have been in June of 2016?	12	Q. Did you think it would be strike that.
13 14	A. June, July.	14	I'll give you another document.
15	Q. And why would you have deleted it?	15	(Exhibit 16 marked.) Q. (By Ms. Libeu) Do you have Exhibit 16 in
16	A. I don't need it. Like I said, I have OCD about weird things. All of my stuff I don't save	16	front of you?
17	text messages. End of every day, all my stuff is	17	A. I do.
18	wiped out. I delete it and start fresh.	18	O. What is it?
19	Q. Have you used this dispatch list for your	19	A. It's another e-mail sent from ProDrivers to
20	work at RivenRock?	20	myself June 12, 2016, of a dispatch sheet.
21	A. The list of these drivers? No.	21	Q. The e-mail is sent on June 16th, right?
22	Q. Have you used any ProDrivers' dispatch list	22	A. Yes.
23	for your work at RivenRock?	23	Q. And you sent it from your ProDrivers'
24	A. No.	24	account to yourself?
25	Q. Did anyone ask you, before you left	25	A. I did.
	Page 299		Page 301
1	Page 299		Page 301
1	ProDrivers, to take ProDrivers' information with you	1 2	Q. And attached to the e-mail is a dispatch
2	ProDrivers, to take ProDrivers' information with you when you left?	2	Q. And attached to the e-mail is a dispatch report for the week ending June 12th; is that right?
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	Page 302		Page 304
1	information?	1	customers are prospects, as you can see. So if one
2	A. No.	2	of these customers is calling me, I need to have my
3	Q. So no one, as part of your on-boarding	3	paperwork in line. Some of these are kind of weird,
4	package, or otherwise, gave you information about	4	like, PG Enterprises, but I need to have this
5	keeping materials a secret at ProDrivers?	5	paperwork. If I need to revert back and fill out an
6	A. I never got an on-boarding packet, and if I	6	employee form, or whatever the case, I have names,
7	did, I'm sure they would have said something. But,	7	and everything I need. Again, common practice, Fran
8	again, I followed in Fran's footsteps. So Fran's	8	has the same stuff on all of our clients. So if we
9	footsteps is, print it out, send it to yourself,	9	need to go somewhere, I can Google something.
10	whatever you have to do if you are on call, because	10	Q. What information is contained about clients
11	we can't trust the after-hours team. It was	11	in this e-mail that is in Exhibit 17?
12	pointless to even have the team in Tennessee. They	12	A. The name I can pretty much remember, if
13	called nonstop. I even looked over all of the times	13	you tell me some of these clients, I can tell you,
14	they called. They literally called me all days of	14	probably, who the manager is there. My brain is not
15	the week, text, phone, so, yeah.	15	sharp right now, because it has been awhile. You
16	Q. What did you do with this e-mail, after you	16	could tell me back in the day, Who is at HD Supply,
17	left ProDrivers?	17	and I could tell you the name. I could just
18	A. If it was in my e-mail, I deleted.	18	remember.
19	Anything in my e-mail, I deleted.	19	Q. But the name of the manager isn't on this
20	Q. I'll show you another document.	20	e-mail, right?
21	(Exhibit 17 marked.)	21	A. Right.
22	Q. (By Ms. Libeu) Do you have Exhibit 17 in	22	Q. It's just the name of the company?
23	front of you?	23	A. Right.
24	A. I do.	24	Q. So why would you need the name of the
25	Q. What is it?	25	companies over the weekend, or whenever you were
	Page 303		Page 305
1	_	1	
1 2	A. It's another dispatch sheet. Q. Are you sure?	1 2	Page 305 using it for outside of the office? A. If I had to Google someone I could
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2	A. It's another dispatch sheet.Q. Are you sure?	2	using it for outside of the office? A. If I had to Google someone I could
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